

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

QUINTEZ TALLEY,	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
v.	:	
	:	
MAJOR CLARK, <u>et al.</u> ,	:	
	:	
Defendants	:	No. 18-5316

STIPULATED PROTECTIVE ORDER

It is hereby **STIPULATED AND AGREED** by and among counsel for the Plaintiff and the Defendants in this matter, that the following items or information, which may be produced to Plaintiff's counsel in the course of discovery (including subpoenas to the DOC and their employees), are for Plaintiff's counsel (and their agents and experts) only, for use in the above captioned litigation only, and that they shall not be publicized or shared with Plaintiff himself, or anyone else, unless permitted under the subsequent terms.


- Plaintiff's mental health records (this does not include medical records that do not address Plaintiff's mental health).
- Pennsylvania Department of Corrections ("DOC") policies or procedures not available on the DOC's public access website that the Defendants identify as confidential.
- Documents or things relating to DOC inmates other than Plaintiff.
- Personnel records of any DOC employee, including records regarding disciplinary matters.
- Any diagrams, drawings or blueprints detailing the layout of cells or cellblocks in DOC facilities.

- Any other sensitive or proprietary document marked confidential by counsel throughout the course of discovery.

These restrictions do not preclude Plaintiff's counsel from discussing with Plaintiff his mental health records for the purposes of representation or litigation. Counsel may waive the above restrictions as to particular documents, things, or information upon request and agreement and the parties should make good faith efforts to reach such an agreement. If an agreement cannot be reached, the parties will contact the Court for resolution of the issue.

This stipulated order does not preclude the parties from using the above-described documents or information in depositions, court filings, or court proceedings, although the parties should make reasonable good faith efforts to limit their disclosure (such as using only the relevant page, if part of a larger document, and through redactions).

The Court retains the right to allow disclosure of any subject covered by this stipulation or to modify this stipulation at any time in the interest of justice.



Kevin R. Bradford,
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Counsel for Defendants

10/5/2021

Date

/s/ Michael R. McDonald

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10/5/2021

Date

Counsel for Plaintiff

APPROVED BY:



Timothy J. Savage, J.

Oct. 8, 2021

Date